

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINARECEIVED  
USDC CLERK GREENVILLE, SC

2018 DEC 11 PM 1:00

LEVINCUS D. YOUNG  
PLAINTIFF[S],  
v.COMPLAINT  
CIVIL ACTION NO. —DEFENDANT[S],  
LAURENS COUNTY  
SHERIFF OFFICE,  
et alI. JURISDICTION & VENUE

I. THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO REDRESS THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE COURT HAS JURISDICTION UNDER 28 U.S.C. SECTION 1331 AND 1333(A)(3) PLAINTIFF SEEKS DECLARATORY RELIEF PURSUANT TO 28 U.S.C. SECTION 2201 AND 2202. PLAINTIFF CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 U.S.C. SECTION 2283 AND 2284 AND RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE.

2). THE DISTRICT OF SOUTH CAROLINA IS AN APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1331(B)(2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM OCCURRED.

## II. PLAINTIFF[s]

3). PLAINTIFF, LEVITICUS D. YOUNG IS AND WAS AT ALL TIMES MENTIONED HEREIN A DETAINEE OF THE STATE OF SOUTH CAROLINA IN THE CUSTODY OF THE GREENVILLE COUNTY DETENTION CENTER. I AM CURRENTLY CONFINED IN LEIBER CORRECTIONAL INSTITUTION, IN RIDGEVILLE SOUTH CAROLINA.

## III. DEFENDANTS

4). DEFENDANT, DOAN REYNOLDS IS THE SHERIFF OF THE LAURENS COUNTY SHERIFF OFFICE. HE IS LEGALLY RESPONSIBLE FOR THE OVERALL OPERATION OF THE LAURENS COUNTY SHERIFF OFFICE AND EACH DEPARTMENT UNDER ITS JURISDICTION.

- 5). DEFENDANT, ANDREW T. DUTTON IS THE DEPUTY CHIEF OF LAUREN'S COUNTY SHERIFF OFFICE. HE IS LEGALLY RESPONSIBLE FOR THE OPERATION OF LAUREN'S COUNTY JAIL AND FOR THE WELFARE OF ALL THE DETAINES OF IN THAT JAIL.
- 6). DEFENDANT, KEITH MCINTOSH, C. MARTIN, J. MCINTOSH is A LAW ENFORCEMENT OFFICER OF THE LAUREN'S COUNTY SHERIFF OFFICE WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF LIEUTENANT AND WAS ASSIGNED TO LAUREN COUNTY SHERIFF OFFICE.
- 7). EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS [OR HER] OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT, EACH DEFENDANT ACTED UNDER THE COLOR OF STATE LAW.

III. FACTS

8). ON OR ABOUT JANUARY 3, 2014 (LT  
KEITH MCINTOSH) ALONE WITH A SECOND  
LAW ENFORCEMENT OFFICER  
ARRIVED AT THE PLAINTIFF[S] HOME  
ADDRESS, WHICH AT THE TIME WAS (26  
101A ST. GREENVILLE, S.C.) WITH A PHOTO  
COPY PHOTOGRAPH LOOKING FOR THE  
PLAINTIFF. UPON NOTICE, PLAINTIFF  
WAS NOTIFIED BY SISTER (NAKISHA  
NICHOLSON) THAT (LAURENS COUNTY  
SHERIFF OFFICE) WAS LOOKING FOR  
HIM WITH WARRANTS. PLAINTIFF WAS  
BIASEDLY AND PREJUDICED PICKED OUT A  
PHOTO LINE UP ON NOVEMBER 19, 2013 BOTH  
VICTIM (DAVID A. WRIGHT) OF (SPRING ST.  
GRAY COURT S.C.), AND (LT CHRIS MARTIN)  
A LAURENS COUNTY INVESTIGATOR. ON  
OR ABOUT THE SAME LISTED ABOVE  
DATE JANUARY 3, 2014 PLAINTIFF CONTACT  
THE (LAURENS COUNTY SHERIFF OFFICE)  
IN REGARD TO THE HOME VISIT AND  
COULDNT RECEIVE NOR GAIN INFORMATION  
ON THE INVESTIGATION. On July 18, 2014

9), PLAINTIFF WAS ARRESTED AND DETAINED IN THE GREENVILLE COUNTY DETENTION CENTER ON CRIMINAL CHARGES, THAT OCCURED IN THE GREENVILLE COUNTY AREA. NO BAIL, UPON INFORMATION AND BELIEF. PLAINTIFF HAD DETAINER(S) IN (LAURENS COUNTY SHERIFF OFFICE). PLAINTIFF FILED THE NECESSARY PETITION REQUESTING TRUE BILL INDICTMENTS AND RIGHTEFUL KNOWLEDGE OF ANY CHARGES BEING HELD AGAINST HIM. WHILE STILL REMAINED, DETAINED IN THE GREENVILLE COUNTY DETENTION CENTER. ON FEB 3, 2015 PLAINTIFF WAS TRANSFERRED TO THE (LAURENS COUNTY SHERIFF'S OFFICE) BY (DEPUTY HUBER R. TOMLISON) OF THE (LAURENS COUNTY SHERIFF OFFICE). NUMBER (3777), TO HAVE WARRANTS SERVED FOR RESISTING ARREST, WARRANT NUMBER 204A3010100016 THAT (LKEITH MCINTOSH) STATED UNDER OATH, WHICH HE LIES UNDER, THE PLAINTIFF DID KNOWINGLY, AND WILLFULLY OPPOSE AND OR RESIST ARREST BY A LAW ENFORCEMENT OFFICER. VERY UNLAWFUL!!

AS WELL ON LARCENY / BREAKING  
INTO MOTOR VEHICLE OR TANKS X4.  
WHERE (I J. MCINTOSH) SWORN  
UNDER OATH THAT PLAINTIFF DID  
BREAK OR ATTEMPT TO BREAK INTO  
A VEHICLE BELONGING TO THE  
VICTIM (WAYMON C. ROACH) WITH THE  
INTENT TO STEAL. VERY PREJUDICE  
AND UNLAWFUL. LIED UNDER OATH.  
ON FEB 3, 2015 PLAINTIFF WAS BOOKED  
INTO LAURENS COUNTY SHERIFF OFFICE  
DETENTION BY PRIVATE (DONNA MARIE  
ALLOY-BAKER) NUMBER (2711). ON FAKE  
DOCUMENTATION, TOOK BEFORE  
(JUDGE TUCKER) AND GAVE A \$25,000  
(BAIL) \$5,000 A PIECE. THIS BOOKING  
PROCESS TOOK 2 DAYS. PAIN AND  
SUFFERING, WALKING IN RESTRAINTS,  
BEING SPUNDEDERED, GOT PLACED IN A  
JAIL BIRD MUG SHOT PAPER WITHOUT  
CONSENT. DEFAMATION!! ON FEB 4, 2015<sup>5</sup>  
PLAINTIFF RETURNED TO THE CUSTODY  
OF GREENVILLE COUNTY WHERE I LATER  
POSTED BAIL, AND AWAITED AN WRIT  
STATEMENT FROM THE COURT TO SAY

(10). PLAINTIFF IS ALLOWED TO GO FROM ONE COUNTY TO ANOTHER WITH A GPS LEG MONITOR ON THE ANKLE. PLAINTIFF REMAINED IN THE CUSTODY OF GREENVILLE COUNTY AN ADDITIONAL (62) DAYS AFTER POSTING BAIL FOR \$100,000 SPENDING NUMEROUS AMOUNTS OF MONEY ON CANTEEN AND SPENT TIME PAIN & SUFFERING, MENTAL PAIN & SUFFERING AND MEDICAL FEES. ON APRIL 10, 2015 PLAINTIFF WAS TRANSFERRED BACK INTO THE CUSTODY OF LAURENS COUNTY SHERIFF OFFICE TO SATISFY DETAINERS. AFTER BEING DETAINED, PLAINTIFF POSTED \$25,000 SURETY BOND AND LATER RELEASED FROM (LAURENS COUNTY SHERIFF OFFICE DETENTION). PLAINTIFF TRAVELED UP AND DOWN THE HIGHWAY, PAYING GAS EXPENSES TO GET TO AND FROM LAURENS COUNTY FOR ROLL CALL APPEARANCES AFTER APPEARANCE. PLAINTIFF GOT VIOLATED AND TERMINATED FROM THE HOUSE ARREST PROGRAM FOR BEING LATE COMING FROM LAURENS COUNTY.

THROUGH ALL THE PAIN AND SUFFERING,  
MENTAL PAIN AND SUFFERING, SLANDER, FALSE  
IMPRISONMENT, AND DEFAMATION. PLAINTIFF  
REMAINED HUMBLE, RESPECTFUL, AND  
INNOCENT AGAINST ALLEGATIONS. UNUSUAL  
PUNISHMENT IS UNUSUAL PUNISHMENT  
AND SHOULD BE ACCEPTED. PLAINTIFF  
FILED PETITION ADDRESS TO PUBLIC DEFENDER  
(KATE KENDALL)(P.O. BOX 174 100 HILLCREST DR  
SUITE P. LAURENS, S.C 29360). REQUESTING  
THAT SHE FILE FOR A SPEEDY TRIAL ON  
MY BEHALF FOR MY INNOCENTS. PLAINTIFF  
ALSO STATED HE WOULD NOT PLEA TO THE  
CHARGES, HE WANTED TRIAL. ON NOV 26,  
2018 PLAINTIFF RECEIVED LEGAL MAIL  
FROM THE PUBLIC DEFENDERS OFFICE  
DATED NOVEMBER 19, 2018 INFORMING  
PLAINTIFF THAT THE STATE HAS DISMISSED  
THE CHARGES. PLAINTIFF'S CONSTITUTIONAL  
RIGHTS WAS DEPRIVED AND SEEKS RELIEF  
ON THIS COMPLAINT.

#### IV. EXHAUSTION OF LEGAL REMEDIES

11). PLAINTIFF LEVINUS D. Young PROPERLY UTILIZED THE LEGAL COURT SYSTEM FOR THE EIGHTH JUDICIAL CIRCUIT, FILING THE NECESSARY PETITIONS OR MOTIONS ON HIS OWN BEHALF UP UNTIL LEGAL COUNSEL WAS APPOINTED, TRYING TO SOLVE THE PROBLEM. ON OR ABOUT APRIL 26, 2015 PLAINTIFF LEVINUS D. Young PRESENTED FACTS RELATING TO THIS COMPLAINT. PLAINTIFF LEVINUS D. Young WAS NEVER SENT ANY RESPONSE FROM THE COURTS.

#### V. LEGAL CLAIMS

- 12). PLAINTIFF REALLEGES AND INCORPORATE BY REFERENCE PARAGRAPHS 1-11.
- 13). THE FALSE IMPRISONMENT, Slander, DEFAMATION, MENTAL SUFFERING, DELIBERATE INDIFFERENCE TO MEDICAL NEEDS VIOLATED PLAINTIFF

LEVITUS D. YOUNG RIGHTS  
AND CONSTITUTED CRUEL AND UNUSUAL  
PUNISHMENT AND A VIOLATION OF  
DUE PROCESS UNDER THE 8<sup>TH</sup>  
AND 14<sup>TH</sup> AMENDMENT TO THE  
UNITED STATES CONSTITUTION.

- 14). THE PLAINTIFF HAS NO PLAIN, ADEQUATE  
OR COMPLETE REMEDY AT LAW TO  
REDRESS THE WRONGS DESCRIBED HERIN.  
PLAINTIFF HAS BEEN AND WILL CONTINUE  
TO BE IRREPARABLY INJURED BY THE  
CONDUCT OF THE DEFENDANTS UNLESS  
THIS COURT GRANTS THE DECLARATORY AND  
INJUNCTIVE RELIEF WHICH PLAINTIFF  
SEEK.

VI. PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF RESPECTFULLY  
PRAYS THAT THIS COURT ENTER JUDGEMENT  
GRANTING PLAINTIFF:

- 15) A DECLARATION THAT THE ACT AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES.
- 16). A PRELIMINARY AND PERMANENT INJUNCTION ORDERING DEFENDANTS DON REYNOLDS (SHERIFF), ANDREW T. DUTTON (DEPUTY CHIEF), (LT) KEITH MCINTOSH, (LT) J. MCINTOSH, AND (LT) CHRIS MARTIN. ALL OF LAURENS COUNTY SHERIFF OFFICE TO PAY THE PLAINTIFF IN THE AMOUNT \$75.000.
- 17). COMPENSATORY DAMAGES IN THE AMOUNT OF \$50.000 AGAINST EACH DEFENDANT JOINTLY AND SEVERALLY.
- 18). PUNITIVE DAMAGES IN THE AMOUNT OF \$25.000 AGAINST EACH DEFENDANT.

- 19). A JURY TRIAL ON ALL ISSUES TRIABLE BY  
JURY.
- 20). PLAINTIFF(S) COSTS IN THIS SUIT.
- 21). ANY ADDITIONAL RELIEF THIS COURT DEEMS  
JUST, PROPER, AND EQUITABLE.

RESPECTFULLY,

DATED: DECEMBER 3, 2018

PRINT NAME: Leviticus Young #311607

SIGN NAME: Leviticus Young

MA ROOM #210

LEIBER CORRECTIONAL INST.

P.O. BOX 205

RIDGEVILLE, S.C 29472